



**PUGET SOUND**  
FREIGHT LINES • TRUCK LINES

**75 YEARS**  
1919-1994

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June 10, 1996

FHWA Docket No. MC-96-18  
Federal Highway Administration  
Office of the Chief Council  
HCC-10, Room 4232  
400 7th St SW  
Washington, DC 20590

Dear Docket Manager;

Puget Sound Truck Lines is one of the many motor carriers that feel the safety fitness ratings issued by FHWA, particularly the "Conditional" rating, are confusing and largely misunderstood by the public. We were, therefore, extremely pleased to see FHWA propose the elimination of the "Satisfactory" and "Conditional" safety ratings. The proposal adds new and significant consequences to the rare motor carrier whose compliance and performance are so far below standard they receive an unsatisfactory rating.

We have always believed that enforcement action, rather than the arbitrary assignment of some rating was both fair and the most effective method of promoting compliance. The new proposal seems even more fair to the motor carrier putting forth a good effort to comply with regulations but that may have overlooked a few administrative details. Even the proposed new method of assigning an unsatisfactory safety rating impressed us as being exceedingly fair to those carriers that need to make more substantial corrections to their safety programs. By being notified of an impending unsatisfactory rating and being told what they need to do to avoid it, they are given the opportunity to avoid the negative impacts of the rating as long as they expediently take the steps required.

The only area which we believe should not be implemented as proposed is the grouping of non-rated motor carriers in the same category as those who have received and passed an on premises compliance review. It would seem to be a much more accurate depiction of the true picture to have two safety ratings, "Unsatisfactory" for the truly unsafe motor carrier and "Not rated" for the carrier who has not passed a compliance check. Actually, we are even surprised that FHWA would not want to keep those statistics separate so they would know how many motor carriers had still never been inspected.

With the exception of the non-rated motor carriers, Puget Sound Truck Lines supports the provision of Docket No. 96-18. We also strongly support FHWA's intention to explore feasible programs of providing incentives or recognition to carriers demonstrating exceptional performance and compliance with regulations.

Sincerely,

*Howard A. Stirk*

Howard A. Stirk  
Vice President  
Maintenance & Safety

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